

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PLATINA BULK CARRIERS PTE LTD,

Plaintiff,

- against -

PRAXIS ENERGY AGENTS DMCC,
PRAXIS ENERGY AGENTS LLC, and
PRAXIS ENERGY AGENTS PTE LTD.

Defendants.

Endorsement
20 Civ. 4892 (NRB)

*The exhibits are temporarily
sealed subject to further
order of the Court.*

Kamini Devi Sathuram
August 22, 2023

**DEFENDANT PRAXIS ENERGY AGENTS LLC'S
INTERIM SEALING MOTION REGARDING CERTAIN EXHIBITS TO ITS
MOTION FOR SUMMARY JUDGMENT**

Defendant Praxis Energy Agents LLC ("Praxis US"), by counsel, and pursuant to the Stipulated Confidentiality Order Regarding Confidentiality of Discovery Material (the "Confidentiality Order") [ECF No. 74], files this interim sealing motion seeking to seal Exhibits 1, 2, 3, 8, 10, 11, 12, 15, 16, 17 to Praxis US' Motion for Summary Judgment [ECF. No. XX].

As grounds for this motion, Defendant Praxis US states as follows:

1. The Confidentiality Order entered in this action permits parties to designate discovery material, including all documents produced in the course of discovery, all Answers to Interrogatories, all Answers to Requests for Admission, all Responses to Requests for Production of Documents, and all deposition testimony and deposition exhibits, as "Confidential" where that information includes but is not limited to previously undisclosed and not publicly available trade secrets, confidential and/or non-public proprietary business information, or other highly confidential, non-public, personal or proprietary business information ("Confidential

Information”), the disclosure of which could be detrimental or harmful to the designating party.”
See Confidentiality Order at Para. 1(a).

2. Paragraph 1(s) of the Confidentiality Order provides, in part, that “to the extent any materials subject to the Confidentiality Order are proposed to be filed or are filed with the Court, those materials and papers, or any portion thereof which disclose confidential information, shall be filed under seal (by the filing party) with the Clerk of the Court with a simultaneous motion [to seal] (the “Interim Sealing Motion”) in accordance with the current version of the Court’s Rules for filing. Even if the filing party believes that the materials subject to the Confidentiality Order are not properly classified as Confidential, the filing party shall file the Interim Sealing Motion.”

3. Defendant Praxis US filed the Proposed Sealed Materials as sealed documents contemporaneously herewith in accordance with the Court’s Electronic Case Filing Rules & Instructions.

4. Defendant Praxis US, in satisfaction of its obligations under the Confidentiality Order, seeks authorization to file under seal the Proposed Sealed Material, which was designated as Confidential.

5. Defendant Praxis US has taken no position with respect to whether the Proposed Sealed Material is properly designated as Confidential and reserves all rights with respect thereto.

WHEREFORE, Defendant Praxis US respectfully requests that the Court enter an Order:

- a. Granting this motion;
- b. Authorizing the interim filing under seal of the Proposed Sealed Material; and

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c. Granting such other and further relief as is appropriate.

Date: August 18, 2023.

/s/ J. Stephen Simms
J. Stephen Simms
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Attorneys for Praxis Energy Agents
LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2023, I caused the foregoing to be filed on the Court's
CM/ECF system for electronic service on all counsel of record.

/s/ J. Stephen Simms
J. Stephen Simms